

# EXHIBIT B

**Ex. B - Non-Exhaustive List Highlighting Duplicative Opinions**

No.	Opinion	Veolia's Experts Offering Cumulative Opinions	# of Experts Offering Opinion
1.	Plaintiffs' experts disregard alternative sources of lead other than Flint water. These potential sources, such as lead paint, dust, soil, tobacco smoke, or seasonal environmental changes predate the switch in water supply.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 3 (Expert Opinion), pp. 35-36, 47 (Criticism of Dr. Sample)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> pp. 6-8, 11, 15, 18 (Expert Opinion); pp. 60-61 (Criticism of Dr. Sample)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> pp. 6-15, 88 (Expert Opinions); pp. 111-114 (Criticism of Dr. Bithoney); p. 116-118 (Criticism of Dr. Sample)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report<sup>2</sup>:</b> pp. 6, 10-11 (Expert Opinions); pp. 18, 21, 26-27, 34-36, 39 (Criticism of Dr. Bithoney); p. 32 (Criticism of Dr. Sample)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> pp. 9, 37-41 (Expert Opinions); pp. 67-69 (Criticism of Dr. Bithoney); pp. 79-81 (Criticism of Dr. Sample)</li> </ul>	5
2.	Plaintiffs' experts value bone scan test results over CDC-recommended blood lead levels.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> pp. 2, 4 (Expert Opinions); pp. 18-19 (Criticism of Dr. Bithoney); pp. 31-41 (Criticism of Dr. Sample)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 66 (Criticism of Dr. Bithoney); p. 66 (Criticism of Dr. Sample)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> pp. 90-91 (Expert Opinions); pp. 114-115 (Criticism of Dr. Bithoney); pp. 118-119 (Criticism of Dr. Sample)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> pp. 5-6 (Expert Opinions); pp. 19, 35 (Criticism of Dr. Bithoney)</li> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> p. 4 (Criticism of Plaintiffs' Experts)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 31 (Expert Opinions); pp. 61-62 (Criticism of Dr. Bithoney); pp. 71, 76-77, 79 (Criticism of Dr. Sample)</li> </ul>	6
3.	Plaintiffs' experts' interpretations of cited studies are misleading in how they are related to Bellwether Plaintiffs.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> pp. 9, 11-13, 15-16 (Criticism of Dr. Specht); pp. 18-19, 26-30 (Criticism of Dr. Bithoney); pp. 32, 35-38, 41-47 (Criticism of Dr. Sample)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 52 (Criticism of Dr. Specht); p. 62-66 (Criticism of Dr. Bithoney); p. 60-61 (Criticism of Dr. Sample)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> pp. 91, 94-95, 100-102, 108 (Criticism of Dr. Specht); p. 113-115 (Criticism of Dr. Bithoney); pp. 116-117 (Criticism of Dr. Sample)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> pp. 19-20, 22-26, 37-38 (Criticism of Dr. Bithoney); pp. 31-32 (Criticism of Dr. Sample)</li> </ul>	5

		<ul style="list-style-type: none"> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> pp. 58-59, 62-65 (Criticism of Dr. Bithoney); pp. 72-75, 80-81 (Criticism of Dr. Sample)</li> </ul>	
4.	Plaintiffs' experts provide incorrect data regarding the half-life of lead children.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> pp. 9-11 (Criticism of Dr. Specht); pp. 19-20 (Criticism of Dr. Bithoney); pp. 38-41 (Criticism of Dr. Sample)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 50 (Criticism of Dr. Specht)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> pp. 89, 91-92, 104-106, 109-110 (Criticism of Dr. Specht); pp. 114-115 (Criticism of Dr. Bithoney)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> pp. 30, 37 (Criticism of Dr. Bithoney)</li> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> pp. 4-5 (Criticism of Plaintiffs' experts)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 28 (Expert Opinions)</li> </ul>	6
5.	Plaintiffs' experts are incorrect regarding the threshold of lead and the idea that there is "no safe level" of lead.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 3 (Expert Opinions); pp. 22, 25 (Criticism of Dr. Bithoney); pp. 35, 37-38, 37-38 (Criticism of Dr. Sample)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 62 (Criticism of Dr. Bithoney)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> p. 116 (Criticism of Dr. Sample)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> pp. 34, 36 (Criticism of Dr. Bithoney); p. 33 (Criticism of Dr. Sample)</li> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> p. 4 (Criticism of Plaintiffs' experts)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> pp. 10, 44 (Expert Opinions); pp. 70, 75 (Criticism of Dr. Sample)</li> </ul>	6
6.	Plaintiffs' experts misattribute the "lag effect" to lead.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 30 (Criticism of Dr. Bithoney); p. 47 (Criticism of Dr. Sample)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 59-60 (Criticism of Dr. Sample)</li> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> p. 5 (Criticism of Plaintiffs' experts)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 62-63 (Criticism of Dr. Bithoney)</li> </ul>	4
7.	Plaintiffs' experts rely on an invalid method of "back-calculating" Bellwether Plaintiff lead levels.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 12-14, 16 (Criticism of Dr. Specht); p. 21 (Criticism of Dr. Bithoney); p. 36 (Criticism of Dr. Sample)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> p. 104-107 (Criticism of Dr. Specht); p. 114 (Criticism of Dr. Bithoney)</li> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> p. 5 (Criticism of Plaintiffs' Experts)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 74-75 (Criticism of Dr. Sample)</li> </ul>	4

8.	Bellwether Plaintiffs' Blood lead levels are below the CDC reference level.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 5-6 (Expert Opinions); p. 63 (Criticisms of Dr. Bithoney)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 3, 38 (Expert Opinions)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> p. 25, 88-89 (Expert Opinions)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 5, 10 (Expert Opinions)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 8-9, 85 (Expert Opinions)</li> </ul>	5
9.	Bellwether Plaintiffs' blood lead levels are too low to contribute to cognitive deficits.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 2 (Expert Opinions); 21-22, 26 (Criticisms of Dr. Bithoney); p. 38 (Criticisms of Dr. Sample)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 11, 19, 22-23, 31 (Expert Opinions)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> p. 86, 88 (Expert Opinions)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 12-15 (Expert Opinions), p. 24 (Criticisms of Dr. Bithoney)</li> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> p. 4 (Expert Opinions), p. 5 (Criticisms of Plaintiffs' experts)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 9-10, 43 (Expert Opinions)</li> </ul>	5
10.	Bellwether Plaintiffs may have been exposed to risk factors of adverse cognitive, neurological, and behavioral outcomes other than lead, e.g.. socioeconomic status, sex, maternal IQ, exposure to tobacco smoke, maternal substance use during pregnancy.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p.19-20 (Expert Opinions); p. 23, 26, 28-30 (Criticisms of Dr. Bithoney); 32-33, 44-45 (Criticisms of Dr. Sample)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 12, 14-18 (Expert Opinions), p. 24-25 (Criticisms of Dr. Bithoney)</li> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> p. 4 (Expert Opinions), p. 5 (Criticisms of Plaintiffs' experts)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 9, 12, 14, 16, 20-21, 21-26, 35 (Expert Opinions), p. 67-68 (Criticisms of Dr. Bithoney); p. 73 (Criticisms of Dr. Sample)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 18-38 (Expert Opinions); p. 61 (Criticisms of Dr. Sample)</li> </ul>	5
11.	Bellwether Plaintiff's ADHD diagnoses cannot be attributed to lead exposure.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 26, 28-29 (Criticisms of Dr. Bithoney); p. 37, 44-48 (Criticisms of Dr. Sample)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 35-36, 46-47 (Expert Opinions); p. 64-65 (Criticisms of Dr. Bithoney)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 9, 31-38 (Expert Opinions); p. 64-65 (Criticisms of Dr. Bithoney)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 19, 25 (Criticisms of Dr. Bithoney)</li> </ul>	3

12.	Blood lead levels cannot be attributed to Bellwether Plaintiffs' IQs.	<ul style="list-style-type: none"> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 12-15 (Expert Opinions), p. 24, 35 (Criticisms of Dr. Bithoney); p. 32 (Criticisms of Dr. Sample)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 9, 33-34, 46-47 (Expert Opinions); p. 64, 72-73 (Criticisms of Dr. Bithoney)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 8, 18-30 (Expert Opinions); p. 55, 57-58 (Criticisms of Graziano); p. 60 (Criticisms of Dr. Sample); p. 63-66 (Criticisms of Dr. Bithoney)</li> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 16-17 (Expert Opinions); p.18, 24-25, 26, 28, 30 (Criticisms of Dr. Bithoney); p. 31, 34-35, 37, 42-44 (Criticisms of Dr. Sample)</li> </ul>	4
13.	Plaintiffs' experts misuse the term "acquired brain injury" and misattribute ABIs to Bellwether Plaintiffs.	<ul style="list-style-type: none"> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 65-66 (Criticisms of Dr. Bithoney)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 32 (Criticisms of Dr. Sample); p. 34, 36 (Criticisms of Dr. Bithoney)</li> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 2 (Expert Opinions); p. 18 (Criticisms of Dr. Bithoney); p. 31 (Criticisms of Dr. Sample)</li> </ul>	3
14.	Plaintiffs' experts do not properly control for confounding factors or cite studies that properly control for confounding factors of Bellwether Plaintiffs' diagnosed ailments.	<ul style="list-style-type: none"> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 26 (Criticisms of Dr. Bithoney); p. 29-31 (Criticisms of Dr. Sample)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 8-9, 10-11, 14, 16, 33, 36, 43-44 (Expert Opinions), p.68 (Criticisms of Dr. Bithoney); p. 72, 74, 82-84 (Criticisms of Dr. Sample)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 44 (Expert Opinions); p. 59, 61 (Criticisms of Dr. Sample)</li> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 18, 22-23, 26-29 (Criticisms of Dr. Bithoney); p. 31-34, 44-46, 48 (Criticisms of Dr. Sample)</li> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> p. 5 (Criticisms of Plaintiffs' experts)</li> </ul>	5
15.	Plaintiffs' experts did not conduct differential diagnoses on Bellwether Plaintiffs.	<ul style="list-style-type: none"> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> p. 5 (Criticisms of Plaintiffs' Experts)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 10-11 (Expert Opinions)</li> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 3 (Expert Opinions); p. 18, 30 (Criticisms of Dr. Bithoney); p. 31-31, 48 (Criticisms of Dr. Sample)</li> </ul>	3
16.	Plaintiffs' experts did not sufficiently account for COVID's impact on Bellwether Plaintiffs.	<ul style="list-style-type: none"> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 7, 17 (Expert Opinions); p. 33 (Criticisms of Dr. Sample); p. 38 (Criticisms of Dr. Bithoney)</li> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 48 (Criticisms of Dr. Sample)</li> </ul>	2

17.	Plaintiffs' experts fail to show that lead causes chronic health issues in children, e.g. kidney disease, cardiac disease, hypertension, essential tremor.	<ul style="list-style-type: none"> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 62-63 (Criticisms of Dr. Bithoney)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 9, 42, 85 (Expert Opinions); p. 50-51 (Criticisms of Graziano); p. 58-60, 62 (Criticisms of Dr. Bithoney)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 21, 36 (Criticisms of Dr. Bithoney)</li> </ul>	3
18.	Dr. Bithoney makes inaccurate claims regarding the body burden of lead in children.	<ul style="list-style-type: none"> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> p. 114 (Criticisms of Dr. Bithoney)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 20-21 (Criticisms of Dr. Bithoney)</li> </ul>	2
19.	Dr. Sample does not provide enough literature to support her claims about the effects of lead.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 39, 45 (Criticisms of Dr. Sample)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 59, 65-66 (Criticisms of Dr. Sample)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> p. 116-117 (Criticisms of Dr. Sample)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 30-33 (Criticisms of Dr. Sample)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 70-71, 75, 78 (Criticisms of Dr. Sample)</li> </ul>	5
20.	Dr. Sample has previously published articles that contradict the opinions in her report for Bellwether Plaintiffs.	<ul style="list-style-type: none"> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> p. 118 (Criticisms of Dr. Sample)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 31-32 (Criticisms of Dr. Sample)</li> <li>• <b>Weed Oct. 27, 2023 Expert Report:</b> p. 76-77, 81, 84 (Criticisms of Dr. Sample)</li> </ul>	3
21.	Dr. Specht's pXRF tests use a non-validated technique.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> pp. 8, 11-13 (Criticisms of Dr. Specht)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> pp. 92-94, 95-97, 100 (Criticisms of Dr. Specht)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 7 (Expert Opinions); 30 (Criticisms of Dr. Specht)</li> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> p. 4 (Criticisms of Expert Opinions)</li> </ul>	4
22.	The more-reliable KXRF device was not used on Bellwether Plaintiffs.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 11-13 (Criticisms of Dr. Specht)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> pp. 50-54 (Criticisms of Dr. Specht)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> pp. 93-97, 98, 100, 102 (Criticisms of Dr. Specht)</li> </ul>	3
23.	Dr. Specht is unable to determine that all lead found in Bellwether Plaintiffs' bones was absorbed during the Flint Water Crisis.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 17 (Criticisms of Dr. Specht)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> pp. 45, 50 (Criticisms of Dr. Specht)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> pp. 104, 108, 109-110 (Criticisms of Dr. Specht)</li> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> p. 5 (Criticisms of Plaintiffs' experts)</li> </ul>	4
24.	Bone lead levels are affected by numerous factors, e.g. age, gender, diet, tobacco use.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 11 (Criticisms of Dr. Specht)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> pp. 45-47 (Criticisms of Dr. Specht)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> p. 95 (Criticisms of Dr. Specht)</li> </ul>	4

		<ul style="list-style-type: none"> <li>• <b>Nelson Oct. 27, 2023 Expert Report:</b> p. 5 (Criticisms of Plaintiffs' experts)</li> </ul>	
25.	It is not possible to have a high bone level without a high Blood lead level, making Dr. Specht's bone test results inconsistent with Bellwether Plaintiffs' blood lead levels taken during the same timeframe.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> pp. 10-11 (Criticisms of Dr. Specht)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> pp. 45-46 (Criticisms of Dr. Specht)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> pp. 91, 108 (Criticisms of Dr. Specht)</li> </ul>	3
26.	Bone lead in children is not a measurement of long-term lead exposure.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 11 (Criticisms of Dr. Specht)</li> <li>• <b>Benson Oct. 26, 2023 Expert Report:</b> p. 46 (Criticisms of Dr. Specht)</li> <li>• <b>Finley Oct. 27, 2023 Expert Report:</b> p. 108 (Criticisms of Dr. Specht)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 30 (Criticisms of Dr. Specht)</li> </ul>	4
27.	Dr. Specht is not a medical doctor.	<ul style="list-style-type: none"> <li>• <b>Banner Oct. 27, 2023 Expert Report:</b> p. 8 (Criticisms of Dr. Specht)</li> <li>• <b>Greenberg Oct. 27, 2023 Expert Report:</b> p. 8 (Criticisms of Dr. Specht)</li> </ul>	2